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Attorneys for Plaintiff,
Jessica Stock

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

**JESSICA L. STOCK, Individually
and On Behalf of All Others
Similarly Situated,**

Plaintiff,

v.

**WELLS FARGO & COMPANY;
WELLS FARGO BANK, N.A.;
and EARLY WARNING
SERVICES, LLC D/B/A
ZELLEPAY.COM,**

Defendants.

Case No.: 8:22-cv-00763-DOC-ADS

**JOINT STIPULATION TO
CONTINUE HEARING DATE AND
FOR BRIEFING SCHEDULE ON
DEFENDANTS' MOTION TO
COMPEL ARBITRATION**

HON. DAVID O. CARTER

Action Filed: April 5, 2022
Trial Date: None Set

JOINT STIPULATION TO CONTINUE HEARING DATE AND FOR BRIEFING SCHEDULE
ON DEFENDANTS' MOTION TO COMPEL ARBITRATION

Case No.: 8:22-cv-00763-DOC-ADS



1 Plaintiff JESSICA STOCK (“Plaintiff”) and defendants WELLS FARGO &
 2 COMPANY and WELLS FARGO BANK, N.A. (“Wells Fargo Defendants”) (together
 3 the “Parties”), through their undersigned counsel, hereby respectfully request that the
 4 Court continue the hearing date for Wells Fargo Defendants’ Motion to Compel
 5 Arbitration (Dkt. No. 29) to **September 12, 2022, at 8:30 a.m.** and set a briefing
 6 schedule as set forth herein.

7 In support of this Stipulation, and to support a showing of good cause, Plaintiff
 8 and Wells Fargo Defendants state as follows:

9 WHEREAS, on or about April 5, 2022, Plaintiff filed a complaint in the above-
 10 referenced case;

11 WHEREAS, on May 31, 2022, defendant Early Warning Services, LLC D/B/A
 12 Zellepay.Com (“Zelle Defendant”) filed a Motion to Dismiss the Complaint (Dkt. No.
 13 23), which is currently set for a hearing on September 12, 2022, at 8:30 a.m. in
 14 Courtroom 10A;

15 WHEREAS, on June 30, 2022, Wells Fargo Defendants filed a Motion to Compel
 16 Arbitration (*see* Dkt. No. 29);

17 WHEREAS, Wells Fargo Defendants’ Motion to Compel Arbitration is currently
 18 set for a hearing on August 1, 2022 at 8:30 a.m. in Courtroom 10A (*see id.*);

19 WHEREAS, pursuant to Local Rules 7-9 and 7-10, Plaintiff’s current deadline to
 20 file an Opposition to Wells Fargo Defendants’ Motion to Compel Arbitration is
 21 Monday, July 11, 2022, with reply briefing due July 18, 2022;

22 WHEREAS, given the fourth of July holiday weekend, Plaintiffs are currently
 23 only afforded six (6) business days to file an opposition to Wells Fargo Defendants’
 24 Motion to Compel Arbitration;

25 WHEREAS, shortly after Wells Fargo Defendants file their Motion to Compel
 26 Arbitration (on June 30, 2022), the Court granted an extension on Wells Fargo
 27 Defendants’ deadline to respond to the Complaint to July 29, 2022, pursuant to the
 28

Parties' prior stipulations (*see* Dkt. Nos. 20 & 27);

WHEREAS, the Parties request that the Court continue the hearing date for Wells Fargo Defendants' Motion to Compel Arbitration until **September 12, 2022, at 8:30 a.m.** in Courtroom 10A;

WHEREAS, the Parties further request that the Court grant Plaintiff until **July 22, 2022** to file an Opposition to the Motion to Compel Arbitration, and also grant Wells Fargo Defendants until **August 24, 2022** to file their optional Reply in support of the Motion to Compel Arbitration;

WHEREAS, the Parties believe this continuance will allow for a more orderly presentation of the issues before the Court as the requested continued hearing date for Wells Fargo Defendants' Motion to Compel Arbitration would be the same day as the hearing on the Zelle Defendant's Motion to Dismiss;

WHEREAS, this request to continue the hearing on Wells Fargo Defendants' Motion to Compel Arbitration (Dkt. No. 29) and to set a briefing schedule is not sought for purposes of undue delay;

WHEREAS, the Parties do not believe this continuance and briefing schedule will affect other case management deadlines, as the Court has not issued a Scheduling Order (and the Parties' Initial Scheduling Conference is currently set for September 12, 2022, at 8:30 a.m.), and no dates have been set for a pre-trial conference or trial;

NOW THEREFORE, the Parties jointly and respectfully STIPULATE and REQUEST that the Court:

1. Order that Plaintiff file her Opposition to the Motion to Compel Arbitration no later than **July 22, 2022**;
2. Order Wells Fargo Defendants to file their optional Reply in support of the Motion to Compel Arbitration no later than **August 24, 2022**; and,
3. Continue the hearing on Wells Fargo Defendants' Motion to Compel Arbitration (Dkt. No. 29) to **September 12, 2022, at 8:30 a.m.** in

Courtroom 10A.

Dated: July 7, 2022

KAZEROUNI LAW GROUP, APC

By: /s/ Jason A. Ibey, Esq.
Abbas Kazerounian, Esq.
Jason A. Ibey, Esq.
Attorneys for Plaintiff

Dated: July 7, 2022

**SEVERSON & WERSON
A PROFESSIONAL CORPORATION**

By: /s/ Mark I. Wraight, Esq._____

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